

From: [McKenna, James \(Jim\)](#)
To: [Eric Blischke/R10/USEPA/US@EPA](#); [JOHNSON Keith](#)
Cc: [akoulermos@newfields.com](#); [ANDERSON Jim M](#); [aron.borok@EILTD.net](#); [Chip Humphrey/R10/USEPA/US@EPA](#); [Carl Stivers](#); [DAWNS@BES.CI.PORTLAND.OR.US](#); [dlivesay@groundwatersolutions.com](#); [erin.madden@gmail.com](#); [frederick.wolf@arkemagroup.com](#); [HOPE Bruce](#); [jean.lee@eiltd.net](#); [Koehl, Krista](#); [Kristine Koch/R10/USEPA/US@EPA](#); [MCCLINCY Matt](#); [Anderson, Nicole](#); [NUSRALA James](#); [ricka@bes.ci.portland.or.us](#); [rjw@nwnatural.com](#); [ROICK Tom](#); [TARNOW Karen E](#); [voster@anchorenv.com](#)
Subject: RE: Updated Stormwater Table
Date: 12/04/2006 10:13 PM

Keith, I want to echo Eric's response and add that the MT focused on developing a list of sites that fall into two categories: a) those that represent certain land uses so that the data obtained from these sites could be used as a surrogate for other similar sites (e.g., heavy industrial, light industrial, parks...); and b) "high priority" sites that may pose a risk to the river but are so unique in terms of source or COPCs that they can not be used to represent a particular land use. I believe we make good progress on this front. Eric revised the list based on comments he heard during Thursday's meeting, and recirculated it to the MT for review/comment. My email was simply responding to his request for comments.

We ran out of time Thursday and therefore did not discuss in great length, nor attempt to come to agreement as to "who" should conduct the sampling. We agreed to have the Management Team continue to develop the list of sites concurrent with the technical sub-group development of appropriate sampling methodologies. We all agreed that the "who" needs to be answered ASAP since sampling needs to start sometime in mid- to late-January.

This is a sticky issue but I feel we have made real progress in the past 4 weeks. We will need to continue to meet and vet the issue in order to have any hope of implementing significant stormwater sampling in January.

Again thanks, Jim.

From: Blischke.Eric@epamail.epa.gov [mailto:Blischke.Eric@epamail.epa.gov]
Sent: Mon 12/4/2006 5:52 PM
To: JOHNSON Keith
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Subject: RE: Updated Stormwater Table

Keith, thanks for offering your viewpoint. For me, the bottom line is that if we are to keep the project on schedule, we need to cobble together a proposal that gives us high quality stormwater data this year. This will include data collection efforts taken by upland parties (LWG and non-LWG members), the City of Portland and likely the LWG as a whole.

For the high priority sites, LWG members have expressed a willingness to perform sampling at their upland sites. This data will be augmented by City of Portland sampling efforts as part of the source control RI and the collection of stormwater grab and catch basin samples at a number of other upland sites. These efforts will undoubtedly leave some gaps. All I ask is that we all work cooperatively to do what we can to fill in

the gaps. The City may have to step up and do a little more. The LWG as a whole may have to step up and do a little more and DEQ and EPA will have to work together to figure out how to compel upland non-LWG members to also do a little more. If we all work together at this, we can succeed in collecting meaningful data this year. If not, we may be looking at tacking another year onto the project schedule.

Eric

JOHNSON Keith
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"McKenna, James (Jim)"
12/04/2006 05:10 PM <Jim.McKenna@portofportland.com>, Eric Blischke/R10/USEPA/US@EPA, "Anderson, Nicole" <Nicole.Anderson@portofportland.com>, ricka@bes.ci.portland.or.us, aron.borok@EILT.net, HOPE Bruce <HOPE.Bruce@deq.state.or.us>, Chip Humphrey/R10/USEPA/US@EPA, Kristine Koch/R10/USEPA/US@EPA, "Koehl, Krista" <Krista.Koehl@portofportland.com>, akoulermos@newfields.com, jean.lee@eilt.net, dlivesay@groundwatersolutions.com, erin.madden@gmail.com, NUSRALA James <NUSRALA.James@deq.state.or.us>, DAWNS@BES.CI.PORTLAND.OR.US, Carl Stivers <cstivers@anchorenv.com>, TARNOW Karen E <TARNOW.Karen@deq.state.or.us>, rjw@hwnatural.com, ROICK Tom <ROICK.Tom@deq.state.or.us>, frederick.wolf@arkemagroup.com
cc
ANDERSON Jim M <ANDERSON.Jim@deq.state.or.us>, voster@anchorenv.com, MCCLINCY Matt <MCCLINCY.Matt@deq.state.or.us>
Subject
RE: Updated Stormwater Table

I missed some observations that were made at the end of the meeting Thursday speculating on DEQ's plans and commitments to addressing additional sampling of stormwater (loading sampling) through our SC

process at non-LWG sites. As I have indicated in the past, we are in the midst of stormwater characterization sampling this year, and our efforts for loading evaluations this water year consist of direction supplied to the City via our Outfalls IGA.

The question I want to address is: Will DEQ be requiring high priority stormwater sites (as identified on the attached list, and potentially others) to collect contaminant loading data (e.g., whole water composite samples and/or sediment traps)?

The answer to this question is "maybe", because the premise is important.

The premise for the sampling proposals currently under discussion and the subsequent list that has been generated is to create a body of information necessary to inform the completion of the RI/FS.

The premise that would underlie DEQ's requirement for a site to collect loading data would be whether or not that information is necessary to make a source control determination. We are currently making those kinds of decisions by comparing screening data (whole water and sediment/catch basin grab samples) to JSCS screening level values. Our decision criteria will evolve as more precise information on the impacts of stormwater becomes available through the Round 2 report and in-water RI/FS and we are better able to evaluate the relative importance of each stormwater discharge into the harbor.

With respect to the sampling proposals currently under discussion, the bottom line is this – at this time, DEQ is not making a commitment to require the non-LWG sites to collect the same stormwater data (composite samples and sediment traps) as the LWG sites. Those site specific decisions will be made after source control has been implemented at sites and will be shaped in part by information coming out of the Round 2 report, modelling work, and RI/FS efforts.

It is our intention to develop those decision criteria, and guidelines for implementation, in time for next water year. The work that is being done now to identify sampling methodologies and techniques will provide the standards for those future investigations.

Keith

-----Original Message-----

From: McKenna, James (Jim) [<mailto:Jim.McKenna@portofportland.com>]

Sent: Friday, December 01, 2006 4:41 PM

To: Blischke.Eric@epamail.epa.gov; Anderson, Nicole; ricka@bes.ci.portland.or.us; aron.borok@EILTD.net; HOPE Bruce; Humphrey.Chip@epamail.epa.gov; Koch.Kristine@epamail.epa.gov; Koehl, Krista; akoulermos@newfields.com; jean.lee@eiltd.net; dlivesay@groundwatersolutions.com; erin.madden@gmail.com; NUSRALA James; JOHNSON Keith; DAWNS@BES.CI.PORTLAND.OR.US; Carl Stivers; TARNOW Karen E; rjw@hwnatural.com; ROICK Tom; frederick.wolf@arkemagroup.com
Cc: ANDERSON Jim M; voster@anchorenv.com
Subject: RE: Updated Stormwater Table

Eric, attached please find a revised version with Port comments in red. Also, it appears you forgot WR-218 (UPRR Albina yard) which we agreed should be a "yes" under high priority sites. Also, OF-18 and OF-19 were

identified by DEQ as high priority, so they should be elevated from the "DEQ JSCS Program" list to the "high priority list". Finally, since the purpose of this table is to identify outfalls that represent "specific land uses" and "high priority properties", I think it would make sense to delete the final category of "DEQ JSCS Program" sites. The DEQ JSCS Program list is a living document that will likely experience routine changes based on the latest DEQ/upland PRP negotiations. Thanks, Jim.

-----Original Message-----

From: Blischke.Eric@epamail.epa.gov

[<mailto:Blischke.Eric@epamail.epa.gov>]

Sent: Thursday, November 30, 2006 6:05 PM

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Cc: anderson.jim@deq.state.or.us; voster@anchorenv.com

Subject: Updated Stormwater Table

Attached. For further discussion. Please send me any errors, comments or additions.

Note that we added Willamette Cove even though this was not vetted fully earlier today.

Valerie, please email me to let me know you received this. I am not sure emails are getting out.

Thanks, Eric

(See attached file: StormwaterOutfallSummaryRevised113006.xls)